

EXHIBIT 4

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17 Attorneys for Plaintiffs CORY
SPENCER, DIANA MILENA REED,
18 and COASTAL PROTECTION
RANGERS, INC.
19

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
22

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
individual; and COASTAL
25 PROTECTION RANGERS, INC., a
26 California non-profit public benefit
corporation,
27

28 Plaintiffs.

CASE NO. 2:16-cv-02129-SJO (RAOx)
PLAINTIFF COASTAL PROTECTION
RANGERS, INC.'S SUPPLEMENTAL
RESPONSE TO REQUEST FOR
PRODUCTION OF DOCUMENTS, SET
ONE, PROPOUNDED BY
DEFENDANT BRANT BLAKEMAN

1
2 v.

3 LUNADA BAY BOYS; THE
4 INDIVIDUAL MEMBERS OF THE
5 LUNADA BAY BOYS, including,
6 but not limited to, SANG LEE,
7 BRANT BLAKEMAN, ALAN
8 JOHNSTON AKA JALIAN
9 JOHNSTON, MICHAEL RAE
10 PAPAYANS, ANGELO FERRARA,
11 FRANK FERRARA, CHARLIE
12 FERRARA, and N. F.; CITY OF
13 PALOS VERDES ESTATES;
14 CHIEF OF POLICE JEFF
15 KEPLEY, in his representative
16 capacity; and DOES 1-10,

17 Defendants.

18 **PROPOUNDING PARTY: Defendant BRANT BLAKEMAN**

19 **RESPONDING PARTY: Plaintiff COASTAL PROTECTION RANGERS,**
20 **INC.**

21 **SET NO.: One**

22 Pursuant to Federal Rule of Civil Procedure 34, Plaintiff COASTAL
23 PROTECTION RANGERS, INC. ("Responding Party") submits these
24 supplemental responses and objections to Request for Production, Set One,
25 propounded by Defendant BRANT BLAKEMAN ("Propounding Party").

26 **PRELIMINARY STATEMENT**

27 Nothing in this response should be construed as an admission by
28 Responding Party with respect to the admissibility or relevance of any fact or
document, or of the truth or accuracy of any characterization or statement of
any kind contained in Propounding Party's Request for Production.

Responding Party has not completed its investigation of the facts relating to

1 this case, its discovery or its preparation for trial. All responses and
2 objections contained herein are based only upon such information and such
3 documents that are presently available to and specifically known by
4 Responding Party. It is anticipated that further discovery, independent
5 investigation, legal research and analysis will supply additional facts and add
6 meaning to known facts, as well as establish entirely new factual
7 conclusions and legal contentions, all of which may lead to substantial
8 additions to, changes in and variations from the responses set forth herein.
9 The following objections and responses are made without prejudice to
10 Responding Party's right to produce at trial, or otherwise, evidence
11 regarding any subsequently discovered documents. Responding Party
12 accordingly reserves the right to modify and amend any and all responses
13 herein as research is completed and contentions are made.

14 **RESPONSES TO REQUEST FOR PRODUCTION**

15 **REQUEST FOR PRODUCTION NO. 1:**

16 Any and all DOCUMENTS that support your contention that any [sic]
17 BRANT BLAKEMAN participated in any way in the "commission of
18 enumerated 'predicate crimes'" as alleged in paragraph 5 of the Complaint.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

20 Responding Party objects to this request for production as premature.
21 Because this request for production necessarily relies upon a contention,
22 and because this matter is in its early stages and pretrial discovery has only
23 just begun, Responding Party is unable to provide a complete response at
24 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
25 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
26 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
27 at *1-2.

1 Responding Party further objects to this request on the grounds that it
2 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
3 with reasonable particularity each item or category of items to be inspected.”
4 Propounding Party’s request for production does not describe an item or
5 category of items with reasonable particularity.

6 Responding Party further objects to the extent that this request for
7 production invades attorney-client privilege and/or violates the work product
8 doctrine by compelling Responding Party to disclose privileged
9 communications and/or litigation strategy. Responding Party will not provide
10 any such information.

11 Responding Party believes that the information requested is
12 documented in photos, videos, text messages and emails some of which
13 have been destroyed or are being withheld by the Defendants in this case.

14 Subject to and without waiver of the foregoing objections, Responding
15 Party responds as follows:

16 Responding Party will produce all responsive documents within its
17 possession, custody, or control.

18 Phone Records:

19 Phone records produced by defendant Alan Johnston.

20 Phone records produced by defendant Sang Lee. LEE 00000038; LEE
21 00000040-41; LEE 00000047; LEE 00000054; LEE 00000061; LEE
22 00000063; LEE 00000069; LEE 00000105-106; LEE 00000108-110; LEE
23 00000123; LEE 00000125; LEE 00000217; LEE 00000220-221; LEE
24 00000230-231; LEE 00000239; LEE 00000240-241; LEE 00000245-246;
25 LEE 00000500; LEE 00000503; LEE 00000508; LEE 00000518

26 Email:

27 Records produced by defendant Sang Lee. LEE 00000008; LEE
28 00000010-27; LEE 00000591

1 Police Reports:

2 PLTF0001-000316. (previously produced)

3 Palos Verdes Estates Police Department, Officer Report for Incident
4 16-0136, dated 1/29/16. CITY216-232. (previously produced)

5 Palos Verdes Estates Police Department, Officer Report for Incident
6 16-02164, dated 2/13/16. CITY 276-284; CITY2061-2086. (previously
7 produced)

8 Palos Verdes Estates Police Department, Officer Report for Incident
9 DR # 17-00587. (Plaintiffs are not in possession, custody or control)

10 Videos:

11 Video of Defendants Blakeman and Johnston harassing Dianna Reed.
12 DFT.BB.00081-84.

13 Defendant Sang Lee and other Bay Boys caught on video.

14 [https://www.theguardian.com/travel/video/2015/may/18/california-surf-](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)
15 [wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video). PLTF2054

16 Video of David Melo harassing Diana Milena Reed and Jordan Wright
17 and attempting to block their access to public beach taken on 1/29/16.
18 PLTF001867.

19 Video of Lunada Bay locals harassing suffers at the 2014 MLK event.
20 PLTF002057.

21 Video of Cassidy Beukema and Devon Demaria harassing suffers at
22 the 2017 MLK event. PLTF002059.

23 Peter McCollum assaults Jeff Hagins, John Hagins, Vietnam combat
24 vet Mike Bernard and his son for surfing the public beach telling them,
25 among other things, "you won't come back here again boy".

26 <https://www.youtube.com/watch?v=J1Ms0ktOaZs>

27 Defendant Michael Papayans - blocking access to the public beach:
28 <https://vimeo.com/88394493>

1 Camplin Memorial Video parts 1-3 believed to be filmed by Mark
2 Griep. PLT002030-32.

3 Video of Hank Harper. PLTF002062

4 Video of Joshua Bernstein harassing Ken Claypool. PLTF002010.

5 Video of Zach Stafford intimidating Ken Claypool. PLTF002063.

6 Video of Lunada Locals. PLTF002058.

7 Photos:

8 PLTF002064, PLTF002066, PLTF002067.

9 **REQUEST FOR PRODUCTION NO. 2:**

10 Any and all DOCUMENTS that support your contention in paragraph 7
11 of the Complaint that BRANT BLAKEMAN “is responsible in some manner
12 for the Bane Act violations and public nuisance described in the Complaint.”

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

14 Responding Party objects to this request for production as premature.
15 Because this request for production necessarily relies upon a contention,
16 and because this matter is in its early stages and pretrial discovery has only
17 just begun, Responding Party is unable to provide a complete response at
18 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
19 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
20 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
21 at *1-2.

22 Responding Party further objects to this request on the grounds that it
23 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
24 with reasonable particularity each item or category of items to be inspected.”
25 Propounding Party’s request for production does not describe an item or
26 category of items with reasonable particularity.

27 Responding Party further objects to the extent that this request for
28 production invades attorney-client privilege and/or violates the work product

1 doctrine by compelling Responding Party to disclose privileged
2 communications and/or litigation strategy. Responding Party will not provide
3 any such information.

4 Responding Party believes that the information requested is
5 documented in photos, videos, text messages and emails some of which
6 have been destroyed or are being withheld by the Defendants in this case.

7 Subject to and without waiver of the foregoing objections, Responding
8 Party responds as follows:

9 Responding Party will produce all responsive documents within its
10 possession, custody, or control.

11 Phone Records:

12 Phone records produced by defendant Alan Johnston.

13 Phone records produced by defendant Sang Lee. LEE 00000038; LEE
14 00000040-41; LEE 00000047; LEE 00000054; LEE 00000061; LEE
15 00000063; LEE 00000069; LEE 00000105-106; LEE 00000108-110; LEE
16 00000123; LEE 00000125; LEE 00000217; LEE 00000220-221; LEE
17 00000230-231; LEE 00000239; LEE 00000240-241; LEE 00000245-246;
18 LEE 00000500; LEE 00000503; LEE 00000508; LEE 00000518

19 Email:

20 Records produced by defendant Sang Lee. LEE 00000008; LEE
21 00000010-27; LEE 00000591

22 Police Reports:

23 PLTF0001-000316. (previously produced)

24 Palos Verdes Estates Police Department, Officer Report for Incident
25 16-0136, dated 1/29/16. CITY216-232. (previously produced)

26 Palos Verdes Estates Police Department, Officer Report for Incident
27 16-02164, dated 2/13/16. CITY 276-284; CITY2061-2086. (previously
28 produced)

1 Palos Verdes Estates Police Department, Officer Report for Incident
2 DR # 17-00587. (Plaintiffs are not in possession, custody or control)

3 Videos:

4 Video of Defendants Blakeman and Johnston harassing Dianna Reed.
5 DFT.BB.00081-84.

6 Defendant Sang Lee and other Bay Boys caught on video.

7 [https://www.theguardian.com/travel/video/2015/may/18/california-surf-](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)
8 [wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video). PLTF002054

9 Video of David Melo harassing Diana Milena Reed and Jordan Wright
10 and attempting to block their access to public beach taken on 1/29/16.
11 PLTF001867.

12 Video of Lunada Bay locals harassing suffers at the 2014 MLK event.
13 PLTF002057.

14 Video of Cassidy Beukema and Devon Demaria harassing suffers at
15 the 2017 MLK event. PLTF002059.

16 Peter McCollum assaults Jeff Hagins, John Hagins, Vietnam combat
17 vet Mike Bernard and his son for surfing the public beach telling them,
18 among other things, "you won't come back here again boy".

19 <https://www.youtube.com/watch?v=J1Ms0ktOaZs>

20 Defendant Michael Papayans - blocking access to the public beach:
21 <https://vimeo.com/88394493>

22 Camplin Memorial Video parts 1-3 believed to be filmed by Mark
23 Griep. PLT002030-32.

24 Video of Hank Harper. PLTF002062.

25 Video of Joshua Bernstein harassing Ken Claypool. PLTF002010.

26 Video of Zach Stafford intimidating Ken Claypool. PLTF002063.

27 Video of Lunada Locals. PLTF002058.

28 Photos:

1 PLTF002064, PLTF002066, PLTF002067, PLTF001868.

2 **REQUEST FOR PRODUCTION NO. 3:**

3 Any and all DOCUMENTS that support your contention in paragraph
4 18 of the Complaint that BRANT BLAKEMAN “sell[s] market[s] and use[s]
5 illegal controlled substances from the Lunada Bay Bluffs and the Rock Fort.”

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

7 Responding Party objects to this request for production as premature.
8 Because this request for production necessarily relies upon a contention,
9 and because this matter is in its early stages and pretrial discovery has only
10 just begun, Responding Party is unable to provide a complete response at
11 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
12 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
13 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
14 at *1-2.

15 Responding Party further objects to this request on the grounds that it
16 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
17 with reasonable particularity each item or category of items to be inspected.”
18 Propounding Party’s request for production does not describe an item or
19 category of items with reasonable particularity.

20 Responding Party further objects to the extent that this request for
21 production invades attorney-client privilege and/or violates the work product
22 doctrine by compelling Responding Party to disclose privileged
23 communications and/or litigation strategy. Responding Party will not provide
24 any such information.

25 Responding Party believes that the information requested is
26 documented in photos, videos, text messages and emails some of which
27 have been destroyed or are being withheld by the Defendants in this case.

28 Subject to and without waiver of the foregoing objections, Responding

1 Party responds as follows:

2 Responding Party will produce all responsive documents within its
3 possession, custody, or control.

4 Videos:

5 Camplin Memorial Video parts 1-3 believed to be filmed by Mark
6 Griep. PLT002030-32.

7 **REQUEST FOR PRODUCTION NO. 4:**

8 Any and all DOCUMENTS that support your contention in paragraph
9 18 of the Complaint that BRANT BLAKEMAN “impede[d] boat traffic” at any
10 time.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

12 Responding Party objects to this request for production as premature.
13 Because this request for production necessarily relies upon a contention,
14 and because this matter is in its early stages and pretrial discovery has only
15 just begun, Responding Party is unable to provide a complete response at
16 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
17 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
18 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
19 at *1-2.

20 Responding Party further objects to this request on the grounds that it
21 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
22 with reasonable particularity each item or category of items to be inspected.”
23 Propounding Party’s request for production does not describe an item or
24 category of items with reasonable particularity.

25 Responding Party further objects to the extent that this request for
26 production invades attorney-client privilege and/or violates the work product
27 doctrine by compelling Responding Party to disclose privileged
28 communications and/or litigation strategy. Responding Party will not provide

1 any such information.

2 Responding Party believes that the information requested is
3 documented in photos, videos, text messages and emails some of which
4 have been destroyed or are being withheld by the Defendants in this case.

5 Subject to and without waiver of the foregoing objections, Responding
6 Party responds as follows:

7 Responding Party will produce all responsive documents within its
8 possession, custody, or control.

9 Photos:

10 PLTF001966, PLTF001970-78, PLTF 002069-70.

11 **REQUEST FOR PRODUCTION NO. 5:**

12 Any and all DOCUMENTS that support your contention in paragraph
13 18 of the Complaint that BRANT BLAKEMAN “dangerously disregard[ed]
14 surfing rules” at any time.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

16 Responding Party objects to this request for production as premature.
17 Because this request for production necessarily relies upon a contention,
18 and because this matter is in its early stages and pretrial discovery has only
19 just begun, Responding Party is unable to provide a complete response at
20 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
21 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
22 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
23 at *1-2.

24 Responding Party further objects to this request on the grounds that it
25 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
26 with reasonable particularity each item or category of items to be inspected.”
27 Propounding Party’s request for production does not describe an item or
28 category of items with reasonable particularity.

1 Responding Party further objects to the extent that this request for
2 production invades attorney-client privilege and/or violates the work product
3 doctrine by compelling Responding Party to disclose privileged
4 communications and/or litigation strategy. Responding Party will not provide
5 any such information.

6 Responding Party believes that the information requested is
7 documented in photos, videos, text messages and emails some of which
8 have been destroyed or are being withheld by the Defendants in this case.

9 Subject to and without waiver of the foregoing objections, Responding
10 Party responds as follows:

11 Responding Party will produce all responsive documents within its
12 possession, custody, or control.

13 Phone Records:

14 Phone records produced by defendant Alan Johnston.

15 Phone records produced by defendant Sang Lee. LEE 00000038; LEE
16 00000040-41; LEE 00000047; LEE 00000054; LEE 00000061; LEE
17 00000063; LEE 00000069; LEE 00000105-106; LEE 00000108-110; LEE
18 00000123; LEE 00000125; LEE 00000217; LEE 00000220-221; LEE
19 00000230-231; LEE 00000239; LEE 00000240-241; LEE 00000245-246;
20 LEE 00000500; LEE 00000503; LEE 00000508; LEE 00000518

21 Email:

22 Records produced by defendant Sang Lee. LEE 00000008; LEE
23 00000010-27; LEE 00000591

24 Police Reports:

25 PLTF0001-000316. (previously produced)

26 Palos Verdes Estates Police Department, Officer Report for Incident
27 16-0136, dated 1/29/16. CITY216-232. (previously produced)

28

1 Palos Verdes Estates Police Department, Officer Report for Incident
2 16-02164, dated 2/13/16. CITY 276-284; CITY2061-2086. (previously
3 produced)

4 Palos Verdes Estates Police Department, Officer Report for Incident
5 DR # 17-00587. (Plaintiffs are not in possession, custody or control)

6 Videos:

7 Video of Defendants Blakeman and Johnston harassing Dianna Reed.
8 DFT.BB.00081-84.

9 Defendant Sang Lee and other Bay Boys caught on video.

10 [https://www.theguardian.com/travel/video/2015/may/18/california-surf-](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video)
11 [wars-lunada-bay-localism-video](https://www.theguardian.com/travel/video/2015/may/18/california-surf-wars-lunada-bay-localism-video). PLTF002054

12 Video of David Melo harassing Diana Milena Reed and Jordan Wright
13 and attempting to block their access to public beach taken on 1/29/16.
14 PLTF001867.

15 Video of Lunada Bay locals harassing suffers at the 2014 MLK event.
16 PLTF002057.

17 Video of Cassidy Beukema and Devon Demaria harassing suffers at
18 the 2017 MLK event. PLTF002059.

19 Peter McCollum assaults Jeff Hagins, John Hagins, Vietnam combat
20 vet Mike Bernard and his son for surfing the public beach telling them,
21 among other things, "you won't come back here again boy".

22 <https://www.youtube.com/watch?v=J1Ms0ktOaZs>

23 Defendant Michael Papayans - blocking access to the public beach:
24 <https://vimeo.com/88394493>

25 Camplin Memorial Video parts 1-3 believed to be filmed by Mark
26 Griep. PLTF002030-32.

27 Video of Hank Harper. PLTF002062.

28 Video of Joshua Berstein harassing Ken Claypool. PLTF002010.

1 Video of Zach Stafford intimidating Ken Claypool. PLTF002063.

2 Video of Lunada Locals. PLTF002058.

3 Photos:

4 PLTF002064, PLTF002066, PLTF002067.

5 **REQUEST FOR PRODUCTION NO. 6:**

6 Any and all DOCUMENTS that support your contention that BRANT
7 BLAKEMAN has illegally extorted money from beachgoers who wish to use
8 Lunada Bay for recreational purposes. (See paragraph 33 j. of the
9 Complaint.)

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

11 Responding Party objects to this request for production as premature.
12 Because this request for production necessarily relies upon a contention,
13 and because this matter is in its early stages and pretrial discovery has only
14 just begun, Responding Party is unable to provide a complete response at
15 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
16 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
17 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
18 at *1-2.

19 Responding Party further objects to this request on the grounds that it
20 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
21 with reasonable particularity each item or category of items to be inspected.”
22 Propounding Party’s request for production does not describe an item or
23 category of items with reasonable particularity.

24 Responding Party further objects to the extent that this request for
25 production invades attorney-client privilege and/or violates the work product
26 doctrine by compelling Responding Party to disclose privileged
27 communications and/or litigation strategy. Responding Party will not provide
28 any such information.

1 Responding Party believes that the information requested is
2 documented in photos, videos, text messages and emails some of which
3 have been destroyed or are being withheld by the Defendants in this case.

4 Subject to and without waiver of the foregoing objections, Responding
5 Party responds as follows:

6 Responding Party has conducted a diligent search and is not presently
7 aware of any responsive documents within Responding Party's possession,
8 custody, or control. Discovery is ongoing, and this contention-based
9 interrogatory is poorly defined and premature. Thus, Responding Party
10 reserves the right to amend this response at the appropriate time in the
11 future if necessary.

12 **REQUEST FOR PRODUCTION NO. 7:**

13 Any and all DOCUMENTS that support your contention that BRANT
14 BLAKEMAN was a part of Civil Conspiracy as identified in your complaint in
15 paragraphs 51 through 53.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

17 Responding Party objects to this request for production as premature.
18 Because this request for production necessarily relies upon a contention,
19 and because this matter is in its early stages and pretrial discovery has only
20 just begun, Responding Party is unable to provide a complete response at
21 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
22 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
23 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
24 at *1-2.

25 Responding Party further objects to this request on the grounds that it
26 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
27 with reasonable particularity each item or category of items to be inspected.”
28 Propounding Party’s request for production does not describe an item or

1 category of items with reasonable particularity.

2 Responding Party further objects to the extent that this request for
3 production invades attorney-client privilege and/or violates the work product
4 doctrine by compelling Responding Party to disclose privileged
5 communications and/or litigation strategy. Responding Party will not provide
6 any such information.

7 Responding Party believes that the information requested is
8 documented in photos, videos, text messages and emails some of which
9 have been destroyed or are being withheld by the Defendants in this case.

10 Subject to and without waiver of the foregoing objections, Responding
11 Party responds as follows:

12 Responding Party will produce all responsive documents within its
13 possession, custody, or control.

14 See response to Request for Production No. 1.

15 **REQUEST FOR PRODUCTION NO. 8:**

16 Any and all DOCUMENTS that support plaintiffs' First Cause of Action
17 in the Complaint (Bane Act Violations) against BRANT BLAKEMAN.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

19 Responding Party objects to this request for production as premature.
20 Because this request for production necessarily relies upon a contention,
21 and because this matter is in its early stages and pretrial discovery has only
22 just begun, Responding Party is unable to provide a complete response at
23 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
24 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
25 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
26 at *1-2.

27 Responding Party further objects to this request on the grounds that it
28 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to "describe

1 with reasonable particularity each item or category of items to be inspected.”
2 Propounding Party’s request for production does not describe an item or
3 category of items with reasonable particularity.

4 Responding Party further objects to the extent that this request for
5 production invades attorney-client privilege and/or violates the work product
6 doctrine by compelling Responding Party to disclose privileged
7 communications and/or litigation strategy. Responding Party will not provide
8 any such information.

9 Responding Party believes that the information requested is
10 documented in photos, videos, text messages and emails some of which
11 have been destroyed or are being withheld by the Defendants in this case.

12 Responding Party further objects to this request on the grounds that it
13 is duplicative of Request No. 2.

14 Subject to and without waiver of the foregoing objections, Responding
15 Party responds as follows:

16 Responding Party will produce all responsive documents within its
17 possession, custody, or control.

18 See response to Request for Production No. 2.

19 **REQUEST FOR PRODUCTION NO. 9:**

20 Any and all DOCUMENTS that support plaintiffs’ Second Cause of
21 Action in the Complaint (Public Nuisance) against BRANT BLAKEMAN.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

23 Responding Party objects to this request for production as premature.
24 Because this request for production necessarily relies upon a contention,
25 and because this matter is in its early stages and pretrial discovery has only
26 just begun, Responding Party is unable to provide a complete response at
27 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
28 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*

1 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
2 at *1-2.

3 Responding Party further objects to this request on the grounds that it
4 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
5 with reasonable particularity each item or category of items to be inspected.”
6 Propounding Party’s request for production does not describe an item or
7 category of items with reasonable particularity.

8 Responding Party further objects to the extent that this request for
9 production invades attorney-client privilege and/or violates the work product
10 doctrine by compelling Responding Party to disclose privileged
11 communications and/or litigation strategy. Responding Party will not provide
12 any such information.

13 Responding Party believes that the information requested is
14 documented in photos, videos, text messages and emails some of which
15 have been destroyed or are being withheld by the Defendants in this case.

16 Subject to and without waiver of the foregoing objections, Responding
17 Party responds as follows:

18 Responding Party will produce all responsive documents within its
19 possession, custody, or control.

20 See response to Request for Production No. 1.

21 **REQUEST FOR PRODUCTION NO. 10:**

22 Any and all DOCUMENTS that support plaintiffs’ Sixth Cause of Action
23 in the Complaint (Assault) against BRANT BLAKEMAN.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

25 Responding Party objects to this request for production as premature.
26 Because this request for production necessarily relies upon a contention,
27 and because this matter is in its early stages and pretrial discovery has only
28 just begun, Responding Party is unable to provide a complete response at

1 this time, nor is it required to do so. See *Kmiec v. Powerwave Techs. Inc. et*
2 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; see also *Folz v.*
3 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
4 at *1-2.

5 Responding Party further objects to this request on the grounds that it
6 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
7 with reasonable particularity each item or category of items to be inspected.”
8 Propounding Party’s request for production does not describe an item or
9 category of items with reasonable particularity.

10 Responding Party further objects to the extent that this request for
11 production invades attorney-client privilege and/or violates the work product
12 doctrine by compelling Responding Party to disclose privileged
13 communications and/or litigation strategy. Responding Party will not provide
14 any such information.

15 Responding Party believes that the information requested is
16 documented in photos, videos, text messages and emails some of which
17 have been destroyed or are being withheld by the Defendants in this case.

18 Subject to and without waiver of the foregoing objections, Responding
19 Party responds as follows:

20 Responding Party has conducted a diligent search and is not presently
21 aware of any responsive documents within Responding Party's possession,
22 custody, or control. Discovery is ongoing, and this contention-based
23 interrogatory is poorly defined and premature. Thus, Responding Party
24 reserves the right to amend this response at the appropriate time in the
25 future if necessary.

26 See response to Request for Production No. 1.

27 **REQUEST FOR PRODUCTION NO. 11:**

28 Any and all DOCUMENTS that support plaintiffs’ Seventh Cause of

1 Action in the Complaint (Battery) against BRANT BLAKEMAN.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

3 Responding Party objects to this request for production as premature.
4 Because this request for production necessarily relies upon a contention,
5 and because this matter is in its early stages and pretrial discovery has only
6 just begun, Responding Party is unable to provide a complete response at
7 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
8 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
9 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
10 at *1-2.

11 Responding Party further objects to this request on the grounds that it
12 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to “describe
13 with reasonable particularity each item or category of items to be inspected.”
14 Propounding Party’s request for production does not describe an item or
15 category of items with reasonable particularity.

16 Responding Party further objects to the extent that this request for
17 production invades attorney-client privilege and/or violates the work product
18 doctrine by compelling Responding Party to disclose privileged
19 communications and/or litigation strategy. Responding Party will not provide
20 any such information.

21 Responding Party believes that the information requested is
22 documented in photos, videos, text messages and emails some of which
23 have been destroyed or are being withheld by the Defendants in this case.

24 Subject to and without waiver of the foregoing objections, Responding
25 Party responds as follows:

26 Responding Party has conducted a diligent search and is not presently
27 aware of any responsive documents within Responding Party's possession,
28 custody, or control. Discovery is ongoing, and this contention-based

1 interrogatory is poorly defined and premature. Thus, Responding Party
2 reserves the right to amend this response at the appropriate time in the
3 future if necessary.

4 See response to Request for Production No. 1.

5 **REQUEST FOR PRODUCTION NO. 12:**

6 Any and all DOCUMENTS that support plaintiffs' Eighth Cause of
7 Action in the Complaint (Negligence) against BRANT BLAKEMAN.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

9 Responding Party objects to this request for production as premature.
10 Because this request for production necessarily relies upon a contention,
11 and because this matter is in its early stages and pretrial discovery has only
12 just begun, Responding Party is unable to provide a complete response at
13 this time, nor is it required to do so. *See Kmiec v. Powerwave Techs. Inc. et*
14 *al.*, 2014 WL 11512195 (C.D. Cal. Dec. 2, 2014) at *1; *see also Folz v.*
15 *Union Pacific Railroad Company*, 2014 WL 357929 (S.D. Cal. Jan. 31, 2014)
16 at *1-2.

17 Responding Party further objects to this request on the grounds that it
18 violates Federal Rule of Civil Procedure 34(b)(1)(A) by failing to "describe
19 with reasonable particularity each item or category of items to be inspected."
20 Propounding Party's request for production does not describe an item or
21 category of items with reasonable particularity.

22 Responding Party further objects to the extent that this request for
23 production invades attorney-client privilege and/or violates the work product
24 doctrine by compelling Responding Party to disclose privileged
25 communications and/or litigation strategy. Responding Party will not provide
26 any such information.

27 Responding Party believes that the information requested is
28 documented in photos, videos, text messages and emails some of which

1 have been destroyed or are being withheld by the Defendants in this case.

2 Subject to and without waiver of the foregoing objections, Responding
3 Party responds as follows:

4 Responding Party has conducted a diligent search and is not presently
5 aware of any responsive documents within Responding Party's possession,
6 custody, or control. Discovery is ongoing, and this contention-based
7 interrogatory is poorly defined and premature. Thus, Responding Party
8 reserves the right to amend this response at the appropriate time in the
9 future if necessary.

10 See response to Request for Production No. 1.

11

12 DATED: March 2, 2017

OTTEN LAW PC

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By: /s/ Victor Otten

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Victor Otten

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Attorneys for Plaintiffs CORY

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SPENCER, DIANA MILENA REED, and
COASTAL PROTECTION RANGERS,
INC.

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PROOF OF SERVICE

Spencer, et al. v. Lunada Bay Boys, et al.; USDC, Central District of California, Case No. 2:16-cv-02129-SJO (RAOx)

STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 3620 Pacific Coast Highway, Suite 100, Torrance, CA 90505.

On March 2, 2017, I served true copies of the following document(s) described as:

PLAINTIFF COASTAL PROTECTION RANGERS, INC.'S RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE, PROPOUNDED BY DEFENDANT BRANT BLAKEMAN

on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with Hanson Bridgett LLP's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 2, 2017, at Torrance, California.

/s/ Victor Otten

Victor Otten

SERVICE LIST

Spencer, et al. v. Lunada Bay Boys, et al.; USDC, Central District of California, Case No. 2:16-cv-02129-SJO (RAOx)

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